

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY APWU/USPS-T-9**
(August 22, 2011)

The United States Postal Service hereby objects to American Postal Workers Union interrogatory APWU/USPS-T-9, dated September 13, 2011. The interrogatory is repeated below and followed by a statement of the basis for the objections.

APWU/USPS-T-9 During the September 8, 2011 hearing on the Postal Service's direct case, Postal Service Witness Dean Granholm testified about the nature of Postal Service comments in response to individualized customer concerns.

- a) For all facilities under review in the RAOI for which a discontinuance study has begun and public comments have been received, please provide all public comments received and USPS responses to these comments.
- b) How were the responses communicated or how will the responses be communicated to individual commenters and the affected community?
- c) When in the process are these responses provided?
- d) The Station and Branch Optimization and Consolidation ("SBOC") initiative which was the subject of Docket No. N2009-1, utilized the *Post Office Discontinuance and Emergency Suspension System (PODESS)* to track discontinuance and emergency suspension activities. Field coordinators also used PODESS to generate documents for use in the discontinuance studies. Under PODESS, when analyzing customer concerns, postal officials were directed to "use Standard Language for common Customer Concerns and Responses (FDB)." See Slide 31 of USPS-LR-N2009-1/5, Discontinuance of Classified Stations and Branches Training Slides, filed August 13, 2009. Examples of the "standard language for common customer concerns and responses" can be found on Pages 43-55 of Library Reference USPS-LR-N2009-1/6, Station/Branch Optimization/Consolidation Initiative Decision Package Sample Documents and Instructions, filed August 13, 2009 (attached).

- i) The Postal Service now uses the *Change Suspension Discontinuance Center (CSDC)* to facilitate discontinuance studies and closure decisions in the RAOI. Is CSDC also a document generating system like PODESS? Does CSDC include standard language for responding to customer concerns like what was utilized in PODESS?
- ii) If the answer to (b)(i) is affirmative, please provide the standard language for responding to customers concerns utilized in CSDC.
- iii) Please provide all additional direction, including any sample language, regarding the content of customer responses.

PRC Order No. 778 established August 30, 2011, as the deadline for intervenor discovery on the Postal Service's direct testimony and September 9, 2011 as the deadline for intervenor discovery directed to the Postal Service for the purpose of developing their direct cases. Presiding Officer's Ruling No. N2011-1/14 adjusted the procedural schedule by shifting the deadline for the filing of intervenor testimony from September 19 to September 26, 2011. Neither the Order nor the Ruling authorizes the filing of new discovery on the Postal Service after September 9, 2011.

Although the preamble to the interrogatories in APWU/USPS-T-9 references the September 8, 2011 testimony of Postal Service witness Granholm, APWU had the opportunity to cross-examine witness Granholm and follow-up on the Commission's cross-examination. Having elected to do neither, APWU should not now be permitted to extend written discovery beyond the period established by the Commission. APWU has had since July 27, 2011 to conduct discovery about the workings of USPS Handbook PO-101 discontinuance review process and how it differs from the past. Individual public

comments submitted in the course of each facility-specific RAOI discontinuance review and the ultimate responses of the Postal Service to them have no bearing on the Commission's task of opining whether the nature of the service changes anticipated as a result of the RAO Initiative conform to the policies of title 39 United States Code.

Accordingly, the Postal Service objects to this interrogatory.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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